

Exhibit 2013

IPR2024-00084

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA**

SYSTEM STORMSEAL PTY LTD and
STORMSEAL USA, LLC,

Plaintiffs/Counterclaim Defendants,

v.

ABC SUPPLY CO., INC., MULE-HIDE
PRODUCTS CO., INC., and STRUCTURAL
WRAP, LLC,

Defendants/Counterclaim Plaintiffs.

C.A. NO. 9:22-cv-81726-AHS

JOINT STIPULATION

Plaintiffs/Counterclaim Defendants System Stormseal Pty Ltd. and Stormseal USA, LLC (collectively, “Plaintiffs” or “Stormseal”) and Defendant/Counterclaim Plaintiff Structural Wrap, LLC (“Structural Wrap”), pursuant to Federal Rule of Civil Procedure 41(c), in an effort to narrow and streamline this case, hereby stipulate as follows:

- Structural Wrap and System Stormseal Pty Ltd. have agreed to file a joint motion with the Patent Trial and Appeal Board (“PTAB”) to terminate IPR2024-00084 relating to U.S. Patent No. 11,168,484 (the ’484 Patent). The ’484 Patent is the patent that Stormseal has accused Structural Wrap of infringing in this litigation.
- Upon PTAB’s termination of IPR2024-00084, Structural Wrap dismisses its Third Counterclaim, Infringement of U.S. Patent No. 11,041,312 with prejudice.
- Structural Wrap concedes infringement of claim 1 of the ’484 Patent. This stipulation is subject to Structural Wrap’s challenge to the validity of claims 1-3 of the ’484 Patent.
- If the parties’ Joint Motion to Terminate IPR2024-00084 is granted by the PTAB, Structural Wrap’s *Sotera* stipulation (D.E. 71-2 and Exhibit 1022 in the IPR proceeding) will be deemed withdrawn and Structural Wrap will be permitted to pursue in this proceeding invalidity arguments within the scope of the April 3, 2024 Report of David G. Smith.

Dated: May 30, 2024

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